

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

APRIL M. POLLEFEYT,

Plaintiff,

v.

MEDICREDIT, INC.,

Defendant.

Case No.: 3:18-cv-00184-C

STIPULATED MOTION FOR EXTENSION OF SUMMARY JUDGMENT DEADLINE

Plaintiff April M. Pollefeyt and Defendant Medicredit, Inc., filed the following Stipulated Motion for Extension of Summary Judgment Deadline:

1. This case was filed on January 24, 2018. *See* Doc. 1. Defendant answered on February 16, 2018. *See* Doc. 10.
2. Since filing, the parties have completed written discovery.
3. The parties had also previously scheduled the deposition of Plaintiff April M. Pollefeyt to occur on March 1, 2019.
4. However, on February 28, 2019, Ms. Pollefeyt experienced a medical emergency that made her unable to appear for her deposition.
5. Summary judgment motions in this case must be filed by 3:00 p.m. on March 15, 2019. *See* Doc. 14 at p. 1.
6. The discovery deadline is 3:00 p.m. on July 15, 2019.
7. Due to scheduling conflicts and Ms. Pollefeyt's medical conditions, the parties are not able to reschedule Ms. Pollefeyt's deposition prior to that deadline.

8. Defendant is in need of Ms. Pollefeyt's deposition in order to prepare its motion for summary judgment.

9. Counsel for the parties are conferring in order to reschedule the deposition of Ms. Pollefeyt on the earliest date that is mutually available and anticipate that it could be taken within the next 21 days.

10. As such, the parties request a twenty-one (21) day extension of the summary judgment deadline, to and including April 5, 2019, at 3:00 p.m.

11. Upon a showing of good cause, this Court may grant the extension of a deadline that has not yet passed. *See* F.R.C.P. 6(b)(1)(A) and Doc. 14 at p. 1.

12. In this case, good cause exists. The parties have completed written discovery and had previously scheduled Ms. Pollefeyt's deposition to allow adequate time for Defendant to file a summary judgment motion.

13. However, due to an unforeseen medical emergency and subsequent scheduling conflict, that parties will not be able to complete her deposition with adequate time prior to the summary judgment deadline in this case.

14. Further, this extension will not affect the discovery cutoff or the filing of any pre-trial materials, which are due on July 15, 2019. *See* Doc. 14.

15. The parties have also stipulated and agreed to this requested extension of the summary judgment deadline.

16. This Court, therefore, should grant this Stipulated Motion for Extension of Summary Judgment Deadline and extend the summary judgment deadline to April 5, 2019, at 3:00 p.m.

WHEREFORE Plaintiff and Defendant request this Court grant their Stipulated Motion for Extension of Summary Judgment Deadline and enter an Order extending the summary judgment deadline in this case to April 5, 2019, at 3:00 p.m.

Dated: March 1, 2019.

Respectfully submitted,

/s/ Jacob F. Hollars

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March, 2019, a copy of the foregoing document was filed served upon the following attorneys via the Court's CM/ECF system:

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